

AO 91 (Rev. 08/09) Criminal Complaint

FILED

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America)

v.)

Alex Gonzalez,
a/k/a "Cam Young"
a/k/a "camyoung831"
a/k/a "camc831")

Case No.

4-13-70120

MHC

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Dec. 13, 2012 to Jan. 17, 2013 in the county of Alameda in the
Northern District of California, the defendant(s) violated:Code Section
18 USC 2252(a)(2)Offense Description
Distribution of child pornography

Approved as to form:

Penalties:

AUSA Rodney C. Villazor

- (1) Imprisonment: Min. 5 years/Max. 20 years
- (2) Fine: \$250,000
- (3) Supervised release: Min. 5 years/Max: Life
- (4) Special assessment: \$100.00

This criminal complaint is based on these facts:

See attached AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

☒ Continued on the attached sheet.

Complainant's signature

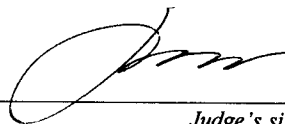
Brandon Dobbs, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

2/1/13



Judge's signature

City and state:

Oakland, California

Hon. Donna M. Ryu

Printed name and title

Document No.

District Court
Criminal Case Processing

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brandon Dobbs, Special Agent of the Federal Bureau of Investigation, being duly sworn, hereby declare as follows:

I. INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed since July 2012. As a FBI Special Agent, I investigate violations of federal law, including cyber crime, and sexual exploitation of minors. As a federal agent, I am authorized to investigate violations of the laws of the United States, and I am a law enforcement officer with authority to execute warrants issued under the authority of the United States.

II. PURPOSE OF THIS AFFIDAVIT

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging ALEX GONZALEZ, a/k/a "Cam Young," a/k/a "camc831," a/k/a "camyoung831" ("GONZALEZ") with distribution of child pornography in violation of 18 U.S.C. § 2252(a)(2).
3. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that, from at least on or about December 13, 2012 to at least on or about January 17, 2013, GONZALEZ did knowingly distribute at least one visual depiction that had been mailed and shipped and transported in and affecting interstate and foreign commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2). The statements contained in this affidavit are based on information provided to me by law enforcement officers as well as my training, experience, and knowledge of this investigation.

III. PROBABLE CAUSE

4. This investigation began as part of an ongoing effort by the FBI Special Agent in Charge, San Francisco (SAC/SF) to proactively combat the distribution of child pornography through the Internet.

5. At all times relevant, D.A., is the mother of a female minor (hereafter "D.A.") and R.A., the female minor daughter of D.A. (hereafter "R.A."). D.A. and R.A. both reside in the Northern District of California.

6. At all times relevant, GONZALEZ is an adult male residing at 446 Baylor Road, Wenonah, New Jersey (the "Wenonah House").

A. **R.A. Meets GONZALEZ on Omegle**

7. According to R.A., she met GONZALEZ on Omegle, a video chat website in the summer of 2012. GONZALEZ introduced himself as "Alex Gonzalez," advised that he lived in New Jersey and went to a college in New Jersey. According to public records, Yris Gonzalez and Alex Gonzalez reside at the Wenonah House. U.S. Postal Inspection Services confirm that "Alex Gonzalez receives mail at the Wenonah House. Finally, according to records from Facebook and publicly accessible information on LinkedIn, "Alex Gonzalez" is an enrolled student at Rowan University. Rowan University is in Glassboro, New Jersey, approximately 9 miles away from the Wenonah House.

8. From the summer of 2012 to December 2012, R.A. and GONZALEZ would communicate on numerous occasions through the application KIK using her iPod Touch, via text messages on her cellular telephone, as well as via video/text chatting on the website Omegle.com.

9. According to R.A., GONZALEZ directed her to take numerous nude photographs of herself, including photographs of her genitalia. GONZALEZ would sometimes instruct her to pose in certain ways and dress in certain ways for these photographs. At the direction of GONZALEZ, R.A. would then send the photographs to him using the KIK application on her iPod Touch. R.A. also provided GONZALEZ with her personal identifying information.

B. GONZALEZ as "camc831" on iMGSRU.ru

10. In approximately December 2012, R.A. discovered that the nude photos of herself that she had previously sent to GONZALEZ were posted on iMGSRU.ru, a free photo-sharing website hosted in Russia, by GONZALEZ under the username "camc831". R.A.'s name, age, and phone number were also listed with her images. According to D.A., random strangers, who purportedly had seen the nude photos of R.A., attempted to contact R.A. via the Internet or by mobile phone until R.A. changed her mobile phone number.
11. During a subsequent in-person interview with R.A., R.A. confirmed with FBI agents that the nude images posted on iMGSRU.ru posted by GONZALEZ were the same pictures she had previously taken of herself and sent to GONZALEZ.

C. GONZALES as "Cam Young" on Facebook

12. R.A. is a user of the social networking website Facebook.
13. GONZALEZ has several Facebook accounts and has used one to distribute nude images of R.A. over the social networking website. On or about January 28, 2013, U.S. District Judge Kandis A. Westmore authorized the execution of a search warrant into GONZALEZ' Facebook accounts "Alex Gonzalez" and "Cam Young," and the warrant was executed shortly thereafter.
14. According to Facebook records, GONZALEZ opened a Facebook account under "Alex Gonzalez", identified himself as Alex Gonzalez and listed "mr.gonzalez973@yahoo.com" as his personal email. Facebook IP logs indicate that GONZALEZ has accessed his "Alex Gonzalez" Facebook account from IP address **68.37.241.222**.
15. In relevant part, on or about November 2, 2012, GONZALEZ opened a separate Facebook account under the user name "Cam Young" from the same IP address, **68.37.241.222**, used to access the "Alex Gonzalez" Facebook account according to Facebook records and IP logs. Yahoo.com IP logs indicate that GONZALEZ from November 1, 2012 to January 17, 2013, GONZALEZ logged into his "mr.gonzalez973@yahoo.com" account on numerous occasions from the same IP address **68.37.241.222**.

16. Starting sometime in November 2012, GONZALEZ, as "Cam Young" on Facebook, began "friending" users associated with R.A. In sum and substance, GONZALEZ presented himself as a potential transfer student into R.A.'s school seeking information about the school. As set forth in Facebook messages, GONZALEZ, as "Cam Young" on Facebook, would advise his new "friends" that they should download the KIK application, i.e., the application R.A. used to transmit the nude photos of herself to GONZALEZ. For example, on December 12, 2012, he sent a message to a friend of R.A.: "Hi cutie :] do you have a kik? Or would you get one? I just got a new one."
17. GONZALEZ, as "Cam Young" on Facebook, also began requesting that his new "friends" encourage R.A. to accept his "friend request." For example, on or about December 4, 2012, he messaged a friend of R.A.:
- Hi, I see you are friends with [R.A.]. She messaged me on here but I can't reply because we're not friends. Could you please let her know that we have to be friends in order for me to be able to message her back? Thanks
- On or about December 6, 2012, he messaged another friend of R.A.:
- Hi, I see you are friends with [R.A.]. She messaged me on here but I can't reply because we're not friends. Could you please let her know that we have to be friends in order for me to be able to message her back? I don't think she knows that lol thanks! :)
18. Sometime in December 2012, R.A. accepted a "friend request" from "Cam Young", unbeknownst to her it was GONZALEZ. According to R.A., she accepted the "friend request" because "Cam Young" was Facebook "friends" with many of her Facebook friends although she has never met "Cam Young" in person.
19. According to Facebook records, on or about December 13, 2012, GONZALEZ, as "Cam Young" on Facebook, uploaded nude images of R.A. onto Facebook and "tagged" the photos with R.A.'s Facebook name so that all of her Facebook "friends" would be notified that the nude images of R.A. were on Facebook.
20. I have reviewed the files mentioned in the previous paragraph and believe that they constitute child pornography as defined in 18 U.S.C. §2256(8). Based on my in-person interview with R.A., I have also visually confirmed that these images are of R.A. The following is a brief description of some these images:

- a. An image file depicting a female lying face down in a bath tub half-full of water. The female's legs are spread and her buttocks are raised above the surface of the water. The photo was taken over the shoulder and part of the female's head is visible in the photograph.
- b. An image file depicting a female lying on her back in a bath tub. The photograph is a close-up of the female's bare breast protruding from the water. Part of the female's face is visible in the photograph.
- c. An image file depicting a female on her knees. The female is nude except for a pair of panties that are pulled down around her knees. The photograph is taken from behind and the female's entire body is visible in the photograph.
- d. An image file depicting a female with her legs spread wide, fully displaying her vagina. The girl's fingers are resting just above her pubic area. This image was previously identified by R.A. as being an image she took herself and sent to "Alex Gonzalez." This image file was also observed on xHamster.com under the profile for user "camyoung831" in a folder labeled with R.A.'s full name and the word "pussy" to describe the folder's contents.

21. According to data associated with each nude image of R.A. posted by GONZALEZ on Facebook, he uploaded each image from IP address **68.37.241.222**.
22. According to Facebook messages from the "Cam Young" account, GONZALEZ admitted that he had uploaded the nude images of R.A. and explained why to at least one friend of R.A. On or about January 3, 2013, a friend of R.A. sent a Facebook message to GONZALEZ, as "Cam Young" on Facebook, and told him that "it was gross what you posted. And I've met [R.A.]." GONZALEZ, as "Cam Young" on Facebook, responded, "So what? She should close her legs then." The friend later added, "And that was not a nice thing to do." GONZALEZ then replied over several messages, R.A. was a "bitch" and a "whore" and added that "maybe she will stop whoring."

C. GONZALEZ as "camyoung831" on xHamster.com

23. On or about January 17, 2013, D.A. contacted the FBI to report the nude photos of R.A. that she had taken of herself and sent to GONZALEZ were now posted on an adult

1 pornographic website, xHamster.com by user "camyoung831." On the same day, an FBI
2 agent, in an undercover capacity, visited xHamster.com and viewed the publicly
3 accessible user profile of "camyoung831." On this user profile, I observed approximately
4 125 individual image files of R.A. These image files were maintained in various folders
5 that appeared to categorize them by what the R.A. was wearing or doing in the pictures.
6 Some of these images depicted R.A. partially or completely nude, and some prominently
7 displayed her genitalia.

8 24. I have reviewed the files mentioned in the previous paragraph and believe that they
9 constitute child pornography as defined in 18 U.S.C. §2256(8). The following is a brief
10 description of some these images:

- 11 a. A close-up image, shot horizontally, depicting a female with her legs spread wide,
12 displaying her vagina. The girl's fingers are resting just above her pubic area. This
13 image was previously identified by R.A. as being an image she took herself and
14 sent to GONZALEZ. This image file was located on xHamster.com in a folder
15 labeled with R.A.'s full name and the word "pussy" to describe the folder's
16 contents.
- 17 b. A close-up image, shot vertically, depicting a female with her legs spread wide,
18 displaying her vagina. The girl's fingers are resting just above her pubic area. This
19 image was previously identified by R.A. as being an image she took herself and
20 sent to GONZALEZ. This image file was located on xHamster.com in a folder
21 labeled with R.A.'s full name and the word "pussy" to describe the folder's
22 contents.
- 23 c. An image file depicting a female with her pants pulled down below her knees. The
24 female is standing and pulling her shirt up to fully expose her buttocks. The photo
25 appears to have been taken in front of a mirror and fully displays the female's
26 buttocks from behind. This image was previously identified by R.A. as being an
27 image she took herself and sent to GONZALEZ. This image file was located on
28 xHamster.com in a folder labeled with R.A.'s full name and the word "red" to
describe the folder's contents.

d. An image file depicting a female lying face-down on a bed. This female is nude and has a towel draped over part of her buttocks. A portion of her buttocks is visible in the photo. The image was previously identified by R.A. as being an image she took herself and sent to Gonzalez. This image file was located on xHamster.com in a folder labeled with R.A.'s full name and the word "towel" to describe the folder's contents.

25. At a subsequent interview, R.A. confirmed that the nude images posted on xHamster.com by "camyoung831" were the same ones she had sent to "Alex Gonzalez."

26. On xHamster.com, I also observed a publicly accessible comment posted by GONZALEZ, as user "camyoung831," stating, in sum and substance, "That is not me in the pictures just a girl I am trying to expose :]". Using the public messaging function on xHamster, I sent a message to "camyoung831" requesting more pictures of R.A. GONZALEZ, as user "camyoung831," replied, "I have one more album of her in the bath tub :]".

27. According to the business records from xHamster.com, the user "camyoung831" joined xHamster on January 10, 2013 and last logged in on January 20, 2013. The IP address logs of xHamster indicate that the last IP address used by "camyoung831" is **68.37.241.222**, i.e., the same IP address used by GONZALEZ, as both "Alex Gonzalez" and "Cam Young" on Facebook and used by GONZALEZ to access his Yahoo.com e-mail account.

D. GONZALEZ Lives at the Wenonah House

28. FBI Special Agents identified Comcast Cable as the Internet Service Provider (ISP) that is registered to the IP address **68.37.241.222** between November 1, 2012 and January 24, 2013. According to Comcast Cable records, the subscriber associated with IP address

1 68.37.241.222 is Yris Gonzalez at the Wenonah House and that this IP address has been
2 continuously used at the Wenonah House from November 1, 2012 to, at least, January 24,
3 2013.

4 29. On or about January 31, 2013, R.A. was shown a photograph of GONZALEZ from his
5 "Alex Gonzalez" Facebook account. She positively identified GONZALEZ as the man
6 who had directed her to take nude photographs of herself and send them to him using the
7 KIK application on her iPod Touch.
8

9 **IV. CONCLUSION**

10 30. For the reasons stated above, I believe there is probable cause to believe that from at least
11 on or about December 13, 2012 to at least on or about January 17, 2013, GONZALEZ did
12 knowingly distribute at least one visual depiction that had been mailed and shipped and
13 transported in and affecting interstate and foreign commerce, and which contains
14 materials which had been so mailed and shipped and transported by any means, including
15 by computer, the production of which involved the use of a minor engaging in sexually
16 explicit conduct and which visual depiction was of such conduct, in violation of Title 18,
17 United States Code, Section 2252(a)(2).
18
19

20 

21 _____
22 Brandon Dobbs
23 Special Agent, Federal Bureau of Investigation

24 Sworn to before me this
25 1 day of February 2013.

26 
27 _____
28 HONORABLE DONNA M. RYU
UNITED STATES MAGISTRATE JUDGE